

EXHIBIT D

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Attorney for Fred A. Daibes

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF

(Substantively Consolidated)

Debtor.

In re:

Bernard L. Madoff,

Debtor

IRVING H. PICARD, Trustee for the
Liquidation Of Bernard L. Madoff
Investment Securities LLC,

Plaintiff,

Adv. Pro. No. 10-05390 (SMB)

v.

1096-1100 River Road Associates, LLC;
Fred A. Daibes, LLC;
Fred A. Daibes

Response to Request for Admissions

1. Defendant must in good faith deny that the attachment to the complaint accurately reflects a complete listing. There is a lack of detail in the exhibit and principal balance calculations based upon bogus statements that are not considered reliable for any purpose cannot in in good faith be relied upon.
2. Defendant must in good faith deny that the attachment to the complaint accurately reflects a complete listing. There is a lack of detail in the exhibit and principal balance calculations based upon bogus statements that are not considered reliable for any purpose cannot in in good faith be relied upon.
3. Defendant must in good faith deny that the attachment to the complaint accurately reflects a complete listing. There is a lack of detail in the exhibit and principal balance calculations based upon bogus statements that are not considered reliable for any purpose cannot in in good faith be relied upon.
4. Defendant must in good faith deny that the attachment to the complaint accurately reflects a complete listing. There is a lack of detail in the exhibit and principal balance calculations based upon bogus statements that are not considered reliable for any purpose cannot in in good faith be relied upon.

5. Defendants must in good faith deny the statement as to accounts and statements are bogus and therefore cannot be relied upon.
6. Defendants must in good faith deny the statement as to accounts and statements are bogus and therefore cannot be relied upon.
7. Defendants must in good faith deny the statement as to accounts and statements are bogus and therefore cannot be relied upon.
8. Defendants must in good faith deny the statement as to accounts and statements are bogus and therefore cannot be relied upon.
9. Defendant denies the allegations of paragraph 9 in good faith.
10. Defendant denies the allegations of paragraph 10 in good faith.
11. Defendant denies the allegations of paragraph 11 in good faith.
12. Defendant denies the allegations of paragraph 12 in good faith.

Dated: September 18, 2015

s/ Richard Abrahamsen
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